

**From:** Daniel Weber

**Sent:** Mon, 14 Mar 2022 09:05:49 +0100

**To:** "COMP-H6@ec.europa.eu" <COMP-H6@ec.europa.eu>

**Cc:**

**Subject:** VS: HT.5822\_Reply\_from\_an\_organisation

**Attachments:** image001.png; image002.jpg

Dear COMP-H6@ec.eu ,

Marine Ingredients Denmark herby states that we fully support the position submitted by The Danish Seafood Association on this matter. We represent producers of fishmeal and fish oil in Denmark, the biggest producing country in the EU and one of the biggest exporters in the World.

Best regards

Daniel Weber

Consultant

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**Fra:** Poul Melgaard Jensen

**Sendt:** 13. marts 2022 18:59

**Til:** COMP-H6@ec.europa.eu

**Emne:** HT.5822\_Reply\_from\_an\_organisation

Dear COMP-H6@ec.eu ,

The Danish Seafood Association would hereby like to submit its views within the public consultation on revised state aid rules for the fishery and aquaculture sector. We are representing

126 Danish companies active within trading and processing of fish and fishery products.

The general and basic aim of the EU competition law, and herein the state aid rules, is to ascertain equal conditions for competition within the EU market. Reading through the rules, regulations and guidelines on state aid relevant for the seafood industry we conclude that our sector *de jure* or *de facto* are lagging behind other industry sectors regarding access to public funding without bringing ourselves in conflict with the EU state aid rules.

We are allegedly not forming part of the general EU block exemptions, while we in the fishery sector have available the EMFAF - i.e. EU and national funding made available for different purposes targeted to operators and to horizontal projects. No part of the fund in Denmark is currently allocated to the seafood industry i.e. for energy-saving; digitalization; innovative machinery and equipment or to other legitimate aims. When operators apply for other funds (outside the EMFAF and outside the general block exemptions) for such aims we are then becoming subject to *de minimis* which is particularly low for our sector i.e. 30 000 EURO in 3 years compared to 200 000 EURO for other industry sectors.

The industry in Denmark for fish and fishery products is thus lagging seriously behind other sectors and the consequences would and could be significant also when facing recent increasingly high energy prices after the Russian invasion of Ukraine calling immediately for public support for energy-saving or energy-transforming investment projects.

Basically, we are calling for a level playing field and that the EU state aid rules would be sufficiently flexible to allow for equal public funding between sectors, also when EMFAF within the national allocation eventually assign no part of its funds to support worthwhile projects and goals within the industry. We are forming part of the supply chain for fish and fishery products and a viable industry would benefit the whole chain.

As for the *de minimis* provisions these should likewise allow for the same level of public funding on an equal footing. We consider the current state aid rules for the fish industry as providing a risk for the equal competition with other industry sectors and between fish industries between EU member states.

Kindest regards

Poul Melgaard Jensen

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